

Cleartel®

COMMUNICATIONS

P.O. Box 4669
Winter Park, Florida 32792

February 26, 2009

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

**Re: Cleartel Telecommunications, Inc., IDS Telcom Corp., Now Communications, Inc., NII Communications, Ltd., Supra Telecommunications and Information Systems, Inc.
Certification of CPNI Filing
EB Docket No. 06-36**

Dear Ms. Dortch:

Please find attached a CPNI Certification and Statement of Compliance for Cleartel Telecommunications, Inc., IDS Telcom Corp., Now Communications, Inc., NII Communications, Ltd., Supra Telecommunications and Information Systems, Inc.

Respectfully submitted,


Jamie Villanueva
Regulatory Affairs Manager

cc: Bryon McKoy via e-mail: byron.mccoy@fcc.gov
Best Copy and Printing via e-mail fcc@bcpiweb.com



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 26, 2009

Name of company covered by this certification: Cleartel Telecommunications, Inc.; IDS Telcom Corp.; Now Communications, Inc.; NII Communications, Ltd.; and Supra Telecommunications & Information Systems Inc.

Form 499 Filer ID: 823716 (Cleartel Telecommunications, Inc.); 825727 (IDS Telcom Corp.; 822814 (Now Communications, Inc.); 819650 (NII Communications, Ltd); 826234 (Supra Telecommunications & Information Systems Inc.).

Name of signatory: Randall P. Muench

Title of signatory: President and CMO

I, Randall P. Muench, certify that I am an officer of the companies named above, (collectively "Cleartel") and acting as an agent of Cleartel, that I have personal knowledge that Cleartel has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how Cleartel's procedures ensure that Cleartel is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Cleartel affirms that it has not taken any action against data brokers and attempted pretexters to access CPNI. In the past year, an ex-husband obtained address information on his ex-wife. The ex-husband called in stating his service was not working at his new residence. He verified the new number and password on the account. After gaining some information from the account, the ex-husband disconnected the call and when the rep called the number of record, he spoke to a female who identified herself as Jean. She informed the rep that her ex-husband was pretending to be her to get information. The Cleartel Customer Service rep insisted the customer to change the password on file and customer refused because she felt the ex-husband would find out. The customer notified local officials regarding the incident. Cleartel self reported this issue and completed documentation.

Cleartel affirms that it has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Randall P. Muench
President and CMO

Cleartel Telecommunications, Inc.; IDS Telcom Corp.; Now Communications, Inc.; NII Communications, Ltd. and Supra Telecommunications and Information Systems, Inc.

STATEMENT OF COMPLIANCE WITH CPNI RULES

Cleartel Telecommunications, Inc. and its affiliates, IDS Telecom Corp.; Now Communications, Inc.; NII Communications, Ltd.; and Supra Telecommunications & Information Systems Inc. (collectively, the "Company"), maintain CPNI in various database and record systems in order to provide telecommunications services to the Company's customers. Each of these systems is protected against unauthorized access. The Company has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. As such, the Company currently does not use CPNI in a manner that requires customer approval and therefore, has not implemented a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. In the event the Company changes its marketing efforts in a way that requires the approval of customers before using CPNI, the Company will implement policies and procedures to ensure compliance with all relevant FCC rules.

As permitted by the CPNI Rules, the Company uses CPNI, without the customer's approval, to (1) to initiate, provide, bill and collect for telecommunications services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) for the purpose of providing customer premises equipment and protocol conversion; (4) in order to provision inside wiring, maintenance and repair services; and (5) to market service offerings among the categories of service (local and interexchange) to which our customers already subscribe.

The Company maintains a record for at least one year of all sales and marketing campaigns that use CPNI. In addition, all outbound marketing campaigns must be approved by the President and Chief Marketing Officer who supervises all of the Company's sales personnel and maintains a record of such supervision for at least one year. The Company contractually requires its independent contractors to maintain the confidentiality of CPNI, to implement protections to ensure the confidentiality of any Company customer's CPNI and prohibits using CPNI for marketing purposes unless the customers provides express opt-in consent for such marketing.

All Company employees who have access to or use CPNI are trained as to when they are and are not authorized to use CPNI. Furthermore, all Company employees are required to review the Company's CPNI Policy which, inter alia, requires employees to hold customer information in the strictest confidence and prohibits Company employee from disclosing such confidential information unless such disclosure is necessary to provide telecommunications services to the Company's customers, permitted by law or otherwise addressed in the Company's CPNI Policy. Employees who violate the CPNI Policy will be subject to discipline, including possible termination.

The Company has implemented procedures whereby it will not provide CPNI without proper customer authentication on inbound telephone calls. In order to authenticate a customer's identity prior to disclosing CPNI generally, the Company uses a variety of methods. When a customer initiates an inbound communication seeking call detail the information, specifically, the Company only will provide that information if the customer provides a password that is not based upon readily available biographical or account information. If the customer is unable to

- ▶ provide a proper password, the Company only will provide the call detail information by sending a copy of such records to the customer's address of record or by contacting the customer at their telephone number of record.

The Company has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms with the relevant FCC rules. In addition, the Company has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, the Company will notify affected customers and will maintain a record of any CPNI-related breaches for a period of at least two years.